

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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IN RE PHARMACEUTICAL INDUSTRY	)	
AVERAGE WHOLESALE PRICE	)	MDL NO. 1456
LITIGATION	)	Civil Action No. 01-12257-PBS
	)	
THIS DOCUMENT RELATES TO ALL	)	Hon. Patti B. Saris
CLASS ACTIONS	)	Chief Mag. Judge Marianne B. Bowler
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**ASTRAZENECA PHARMACEUTICAL LP'S  
MOTION FOR LEAVE TO FILE UNDER SEAL**

AstraZeneca Pharmaceutical LP, by its attorneys, hereby moves this Court for leave to file under seal the Declaration of Trisha Lawson in Support of AstraZeneca Pharmaceutical LP's Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Deposition of David Brennan and Supplement to Plaintiffs' Motion for Leave to Set Aside the Ten Deposition Limit with Respect to Defendant AstraZeneca Regarding 30(b)(6) Deposition Related to Sales Training and the exhibits attached to the Trisha Lawson Declaration.

Pursuant to the Protective Order entered by this Court on December 13, 2002 (the "MDL Protective Order"), the parties in the above captioned cases and non-party witnesses have designated many documents and other information produced in these cases as either "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL." The Trisha Lawson Declaration and exhibits thereto incorporates – either directly or indirectly – information that has been designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL." Pursuant to paragraph 15 of the MDL Protective Order, any document or pleading containing quotes from or otherwise referencing such information shall be filed under seal.

WHEREFORE, AstraZeneca Pharmaceuticals LP respectfully requests that the Court grant it leave to file the Trisha Lawson Declaration and attached exhibits under seal.

Dated: Boston, Massachusetts  
September 16, 2005

Respectfully Submitted,

By: Henry J. Miller

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**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for defendant conferred with counsel for plaintiff on this motion, and plaintiffs state although plaintiffs have not yet seen the Lawson Declaration and therefore cannot determine if AstraZeneca's request file under seal is appropriate, in the interest of cooperation and efficiency, plaintiffs do not oppose AstraZeneca's motion. Plaintiffs do, however, reserve the right to challenge AstraZeneca's designation if they subsequently deem a challenge appropriate.

Henry F. Mc

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on September 16, 2005, a copy to Verilaw Technologies for posting and notification to all parties.

Henry F. Mc